

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,)	
)	
Petitioner,)	
)	
v.)	Case No. 25-mc-00011 (ADC-GLS)
)	
ANA IZQUIERDO,)	
)	
Respondent.)	

United States’ Response to Respondent’s Motion to Strike

Respondent moves under Fed. R. Civ. P. 12(f) to strike two paragraphs of the petition, stating that the petition incorrectly suggests that Respondent “ignored ... [or] did not act in good faith”¹ in responding to an IRS summons. The United States has reviewed the petition and agrees with Respondent that the petition inadvertently contains incorrect assertions. The United States has filed an Amended Petition that corrects this error.² Because this issue is now moot, the motion should be denied.³

Dated: February 28, 2025

/s/ Michael R. Pahl
MICHAEL R. PAHL
PR No. G04214
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 7238

¹ Dkt 8 at 2.

² Dkt. 12.

³ The United States does not believe that the inadvertent misstatements of fact contained in those paragraphs constitute “matter that is immaterial, impertinent, or scandalous” under Rule 12(f).

Washington, D.C. 20044
P: (202) 598-5863
michael.r.pahl@usdoj.gov
Attorney for United States of America

Certificate of Service

I hereby certify that on February 28, 2025, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to defense counsel.

s/Michael R. Pahl
Michael R. Pahl
Attorney for the United States